

BST would charge any unaffiliated IXC for such service. *Id.* ¶ 130. Where BST uses access for provision of its own services, BST will impute to itself the same amount it would charge an unaffiliated IXC. *Id.* Finally, to the extent that BST is permitted to provide interLATA or intraLATA facilities or services to BSLD, BST will make such services or facilities available to all carriers at the same rates and on the same terms and conditions, in accordance with section 272(e)(4). *Id.* ¶ 134.

Joint Marketing Provisions of Section 272(g). Pursuant to 272(g)(1), BSLD will not market or sell BST's telephone exchange service unless BST permits BSLD's competitors to do so as well. *Ruscilli/Cox Joint Aff.* ¶ 136. Likewise, in compliance with the Commission's requirements in paragraph 356 of the *Second Louisiana Order*, BSLD will not market information services or BST exchange services unless BST permits other information service providers to market and sell telephone exchange services. *Id.*

In its *South Carolina Order*, the Commission clarified the relationship between a BOC's joint marketing rights pursuant to section 272(g) and its equal access obligations under section 251(g). The Commission concluded that a BOC may market its long-distance service during inbound calls as long as it also "offers to read, in random order, the names and, if requested, the telephone numbers of all available interexchange carriers." *South Carolina Order* ¶ 239; see also *New York Order* ¶ 419. When authorized to offer long-distance service in Louisiana and Georgia, BellSouth will use this same joint marketing approach for inbound telemarketing. *Ruscilli/Cox Joint Aff.* ¶ 140.

Training and Compliance. BellSouth has developed a compliance plan to ensure satisfaction of its obligations under section 272. Examples of the nondiscrimination aspects of the compliance program include an overview of section 272's requirements for all BST and

BSLD employees. *Jones Aff.* ¶¶ 4-22; *Bhalla Aff.* ¶ 15. BST also sends out letters to its employees stressing the importance of compliance with the Act's provisions, and provides an "Ethics Hotline," which may be used to report, anonymously, any suspected violations of applicable requirements. *Jones Aff.* ¶¶ 4-22. In addition, BSLD provides its employees with contacts within BSLD who are available to provide assistance regarding section 272's requirements. *Bhalla Aff.* ¶ 15. These procedures will ensure that the letter and spirit of section 272 and its implementing regulations are honored.

BellSouth has put in place measures to ensure that former BST employees that BSLD has hired will not serve as improper conduits of information between BST and BSLD. All BST and BSLD employees receive extensive training regarding their obligations under the Act. *Jones Aff.* ¶¶ 4-22; *Bhalla Aff.* ¶ 15; *Cochran Aff.* ¶ 38. Each BST employee receives a letter that in part warns the employee that a transaction between BST and BSLD must be conducted openly by written agreement and may only be undertaken after the transaction receives proper approval. *Jones Aff.* ¶ 12. BSLD also conducts education sessions, attended by every employee, regarding the requirements of the Act. *Bhalla Aff.* ¶ 15. The legal department has conducted live training classes for every BSLD employee since April 30, 2001. *Id.* Furthermore, all BSLD employees who have joined BSLD since May 1, 2001, are provided documents that discuss the employees' obligations under section 272. *Id.* BSLD will continue to provide live training to all its employees on a periodic basis. *Id.*

CONCLUSION

For the reasons presented above, this Application should be granted.

Respectfully submitted,



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October 2, 2001

REQUIRED STATEMENTS

Pursuant to the Commission's Public Notice, Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (FCC rel. Mar. 23, 2001), BellSouth states as follows:

- (a) pages i-iii of this Brief contain a table of contents;
- (b) pages 1-7 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 18-20 of this Brief contain statements identifying how BellSouth meets the requirements of section 271(c)(1); the tables of contents of Appendices B-GA and B-LA identify the agreements on which BellSouth relies in this joint application; Attachment 3 to this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 8-17 of this Brief contain a statement summarizing the status and findings of the Georgia and Louisiana Public Service Commissions' proceedings examining BellSouth's compliance with section 271;
- (e) this Brief contains the legal and factual arguments outlining how the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 26-149 address the requirements of section 271(d)(3)(A); pages 160-167 address the requirements of section 271(d)(3)(B); and pages 149-160 address the requirements of section 271(d)(3)(C);
- (f) Attachment 4 (separately bound) contain a list of all appendices (including affidavits) and the location of and subjects covered by each of those appendices;
- (g) Inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by BellSouth in this joint application should be addressed to:

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- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002, and certifications signed by officers or duly authorized employees certifying that all information supplied in this joint application is true and accurate to the best of their information and belief are included as Attachment 2 to this Brief.
- (i) The Brief and its supporting affidavits can be found at www.bellsouthcorp.com/policy/271. This website is also identified on page 7 of this Brief.

Alfred M. Callahan

J. Jewell

In the Matter of:

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James R. [Signature]



FEDERAL COURT CHALLENGES UNDER 47 U.S.C § 252(e)(6)

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the Georgia Public Service Commission:

AT&T Communications of the Southern States, Inc. v. BellSouth Telecommunications, Inc., et al., No. 1:97-CV-0884-RWS (N.D. Ga.)

MCI Telecommunications Corp., et al. v. BellSouth Telecommunications, Inc., et al., No. 1:97-CV-1318-RCF (N.D. Ga.)

AT&T Communications of the Southern States, Inc. v. BellSouth Telecommunications, Inc., et al., No. 1:98-CV-0163 (N.D. Ga.)

BellSouth Telecommunications, Inc. v. Georgia Public Service Commission, et al., No. 1:00-CV-1024-RWS (N.D. Ga.)

The following consolidated cases pending represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the Louisiana Public Service Commission:

AT&T Communications of the South Central States, Inc. v. BellSouth Telecommunications, Inc., et al., 43 F. Supp. 2d 593 (M.D. La. 1999) (finding lack of jurisdiction), rev'd, 238 F.3d 636 (5th Cir. 2001) reh'g denied, 252 F.3d 593 (5th Cir. 2001). On remand to the district court, the consolidated cases (Nos. 97-1136, 97-1137 & 98-1056) are administratively stayed pending resolution of Eleventh Amendment issues in other cases pending before the U.S. Supreme Court.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Joint Application by BellSouth Corporation,
BellSouth Telecommunications, Inc.,
and BellSouth Long Distance, Inc. for
Provision of In-Region, InterLATA Services
in Georgia and Louisiana

CC Docket No.

01-277

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OFFICE OF THE SECRETARY

**BRIEF IN SUPPORT OF APPLICATION BY BELL SOUTH FOR PROVISION
OF IN-REGION, INTERLATA SERVICES IN GEORGIA AND LOUISIANA**

BRIEF ATTACHMENT 4

DETAILED INDEX OF APPENDICES

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Affidavits

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A	Ken L. Ainsworth (Local Carrier Service Center)
B	Pavan Bhalla (BellSouth Long Distance Section 272 Compliance)
C	Al Bolden (Local Number Portability)
D	D. Daonne Caldwell (Cost Studies)
E	Guy L. Cochran (BST Section 272 Compliance)
F	Douglas R. Coutee (Access to Directory Assistance and Operator Service)
G	Eric Fogle (Wholesale DSL)
H	Wayne Gray (Collocation Processes)
I	Alfred A. Heartley (Network Regionality)
J	Terrie Hudson (Access to White Page Directory Listings)
K	Nathaniel Jones (BST Section 272 Compliance – Employee Training)

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L	Linda M. Kinsey (Access to Poles, Ducts, Conduits, and Rights-of-Way)
M	Wiley G. Latham, Jr. (Access to xDSL Loops)
N	Jamshed K. Madan and Michael D. Dirmeier (Georgia Loop Rate Study)
O	W. Keith Milner (Interconnection; Access to Network Elements; Poles, Ducts, Conduits, and Rights-of-Way; Loops; Transport; Switching; Access to 911, E911, Directory Assistance, and Operator Call Completion; White Pages Listings; Number Administration; Access to Databases and Associated Signaling; Number Portability; Local Dialing Parity; Reciprocal Compensation; Resale)
P	Edward J. Mulrow (Statistical Methodology for Self-Effectuating Enforcement Mechanism)
Q	John A. Ruscilli and Cynthia K. Cox (Policy; Pricing; SGATs and Binding Legal Commitments; Local Switching; Local Dialing Parity; Reciprocal Compensation; Resale; Section 272 Compliance)
R	Valerie Sapp (Access to 911 Services)
S	David P. Scollard (Billing)
T	William N. Stacy (Access to Operations Support System)
U	Alphonso J. Varner - Georgia and Louisiana (Performance Measures)
V	Victor K. Wakeling (Local Competition and Track A)
W	Thomas G. Williams (Line Sharing and Line Splitting)

**JOINT APPLICATION BY BELLSOUTH
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DIECA Communications, Inc. d/b/a Covad Communications Company
e*spire Communications, Inc.
Intermedia Communications, Inc.
Knology of Georgia, Inc.
MCImetro Access Transmission Services, LLC
MediaOne Telecommunications of Georgia, LLC
Mpower Communications Corporation
NPCR, Inc. d/b/a Nextel Partners
Teleport Communications Group, Inc.
XO Georgia, Inc.
Z-Tel Communications, Inc.

**JOINT APPLICATION BY BELLSOUTH
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1	2	11/08/96	PSC's Revised Procedural and Scheduling Order (Docket No. 6863)
1	3	11/13/96	PSC's Omitted Exhibit A to Revised Procedural and Scheduling Order (Docket No. 6863)
1	4	01/15/97	PSC's Order Clarifying Requirement of Notification of Intent To File an Application with FCC (Docket No. 6863)
1	5	03/21/97	PSC's Order re. Statement (Docket No. 7253)
1	6	03/31/97	BST's Motion for Rehearing and Clarification or, in the Alternative, for Further Consideration of 03/21/97 Order Rejecting SGAT (Docket Nos. 6863 and 7253)
1	7	06/10/97	PSC's Revised Order Scheduling Continued Review (Docket Nos. 6863 and 7253)
1	8	06/13/97	PSC's Notice Canceling 06/24/97 Hearing, Rescheduling Hearing to 07/14/97 and Revising Filing Schedule (Docket Nos. 6863 and 7253)
1	9	06/20/97	PSC's Revised Procedural and Scheduling Order To Provide Rebuttal Phase (Docket Nos. 6863 and 7253)
1	10	09/30/97	PSC's Order Directing BST To Provide It With 30-Day's Notice in Advance of Its FCC Filing (Docket No. 6863)
1	11	01/15/98	PSC's Order re. Revised Statement (Docket No. 7253)
1	12	01/26/98	BST's Motion for Reconsideration and Clarification of Footnote 2 of the PSC's Order re. Revised SGAT (Docket Nos. 6863 and 7253)
1	13	03/12/98	PSC's Order on Motion for Reconsideration and Clarification of PSC's 01/15/98 Order re. Revised SGAT (Docket Nos. 6863 and 7253)
1	14	06/04/98	PSC's Amendatory Procedural and Scheduling Order (Docket Nos. 6863 and 7253)
1	15	10/15/98	PSC's Order Accepting Staff's Recommended Report and Opinion and Establishing Procedure and Schedule (Docket No. 6863)
1	16	10/15/98	Staff's Report and Opinion (Docket No. 6863)

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3a-3c	19	03/02/00	BST's Cost Studies Supporting Its Cost-Based Rates for UNEs and Revised SGAT (Docket Nos. 6863, 7253, and 10692)
4	20	03/17/00	BST's Non-Recurring Cost Studies Supporting Its Cost-Based Rates for UNE Combinations (Docket Nos. 6863, 7253, and 10692)
5a	21	04/28/00	BST's Attachment A to Its SGAT and Additional Cost Studies (Docket Nos. 6863, 7253, and 10692)
5a-5b	22	05/04/00	BST's Modifications to Its SGAT and Corrections to Its Cost Studies (Docket Nos. 6863, 7253, and 10692)
5b	23	05/17/00	BST's Updated Pages to Ordering Guide for CLECs (Docket Nos. 6863 and 7253)
6	24	10/27/00	BST's Update to 05/4/00 Statement (Docket Nos. 6863, 7253 and 10692)
6	25	04/19/01	PSC's Procedural and Scheduling Order for Comments (Docket No. 6863)
6	26	05/07/01	PSC's Second Procedural and Scheduling Order for Comments (Docket No. 6863)
7a-7d	27	05/31/01	BST's Comments re. BST's Section 271 Checklist Compliance (Docket No. 6863)
7d	28	05/31/01	Z-Tel's Comments and Joint Affidavit of J. Adams, D. Forester, and M. Rubino (Docket No. 6863)
7d	29	05/31/01	Sprint's Initial Comments (Docket No. 6863)
8a-8b	30	05/31/01	AT&T's Comments (Docket No. 6863)
9	31	05/31/01	DIECA d/b/a Covad's Comments and Affidavit of C. Davis (Docket No. 6863)
9	32	05/31/01	Birch Telecom's Comments (Docket No. 6863)
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9	35	05/31/01	NewSouth Communications' Comments and Accompanying Affidavits (Docket No. 6863)
9	36	05/31/01	KMC Telecom's Comments (Docket No. 6863)
9	37	05/31/01	Access Integrated Network's Comments (Docket No. 6863)
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10	40	06/01/01	AT&T's Supplemental Affidavit of S. Norris Omitted from 05/31/01 Filing (Docket No. 6863)
10	41	06/04/01	KMC Telecom's Fully Executed Signature Page of Affidavit of K. Johnson (Docket No. 6863)
10	42	06/04/01	BST's Revised Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale (Docket Nos. 6863, 7253, and 10692)

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10	45	06/07/01	KMC Telecom's Fully Executed Signature Page of Affidavit of C. Weiss, III (Docket No. 6863)
10	46	06/22/01	National ALEC Association/Prepaid Communications Association's Comments re. BST's Application (Docket No. 6863)
10	47	06/26/01	The Alternative Phone Company's Letter of Comments re. BST's Request To Provide In-Region InterLATA Services in Georgia (Docket No. 6863)
10	48	07/03/01	Image Access d/b/a NewPhone's Letter Urging Commission to Conclude that BST's Attempts to Enter InterLATA Market are Premature until BST Fully Satisfies Section 271 Competitive Checklist (Docket No. 6863)
10	49	07/03/01	BST's Response to The Alternative Phone Company's 06/26/01 Letter (Docket No. 6863)
10	50	07/06/01	Annox, Inc.'s Letter Urging Commission to Conclude BST's Attempts to Enter InterLATA Market are Premature until BST Fully Satisfies Section 271 Competitive Checklist (Docket No. 6863)
10	51	07/13/01	Access Integrated Network's Reply Comments (Docket No. 6863)
11a-11b	52	07/16/01	BST's Reply Comments (Docket No. 6863)
12	53	07/16/01	AT&T, Teleport Communications, and AT&T Broadband's Reply Comments and Supplemental Affidavit of S. Norris (Docket No. 6863)
12	54	07/16/01	CTA's Reply Comments (Docket No. 6863)
12	55	07/16/01	Mpower's Reply Comments (Docket No. 6863)
12	56	07/16/01	Sprint's Reply Comments (Docket No. 6863)
12	57	07/16/01	DIECA d/b/a Covad's Reply Comments (Docket No. 6863)
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12	61	07/16/01	NewSouth's Reply Comments (Docket No. 6863)
12	62	07/16/01	ITC^DeltaCom's Reply Comments (Docket No. 6863)
12	63	07/16/01	Allegiance Telecom's Reply Comments (Docket No. 6863)
13	64	07/16/01	Birch Telecom's Reply Comments (Docket No. 6863)
13	65	07/19/01	1-800 Reconex, Inc.'s Letter Urging Commission to Conclude that BST's Attempts to Enter InterLATA Market are Premature until BST Fully Satisfies Section 271 Competitive Checklist (Docket No. 6863)
13	66	07/25/01	BST's Request that Commission Disregard Letters from National ALEC Association/Prepaid Communications Association and 1-800-RECONEX Concerning BST's Entry into Long Distance Market in Georgia (Docket No. 6863)

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13	67	07/25/01	BST's Request that Commission Disregard Letters from Image Access d/b/a/ NewPhone and Annox Concerning BST's Entry into Long Distance Market in Georgia (Docket No. 6863)
13	68	08/27/01	BST's Revised Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale (Docket Nos. 6863, 7253, and 10692)
13	69	09/12/01	AT&T, Teleport, and AT&T Broadband's Petition for Investigation Into BellSouth's Conduct in Processing CLEC Orders and Retiring of Key OSS Systems (Docket Nos. 6863 and 8354)
13	70	09/12/01	BST's Revised Attachment A to Revised Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale (Docket Nos. 6863, 7253, and 10692)
13	71	09/13/01	MCI's Affidavit of S. Lichtenberg (Docket No. 6863)
13	72	09/13/01	AT&T's Replacement Exhibits for AT&T, Teleport, and AT&T Broadband's Petition for Investigation Into BellSouth's Conduct in Processing CLEC Orders and Retiring of Key OSS Systems (Docket Nos. 6863 and 8354)
13	73	09/18/01	Mpower's Supplemental Comments in Response to Second Procedural and Scheduling Order for Comments (Docket No. 6863)
13	74	09/19/01	Sprint's Letter to PSC Supporting AT&T's Request for Expedited Hearings (Docket Nos. 6863 and 8354)
13	75	09/25/01	BST's Revised Attachment A to Revised Statement of Generally Available Terms and Conditions for Interconnection, Unbundling and Resale (Docket Nos. 6863, 7253, and 10692)

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1	5	09/11/00	BST's Hot Cut Reconciliation Report, Hot Cut Reconciliation Report Flow, and Hot Cut Reconciliation Process Schedule
1	6	11/06/00	AT&T's Comments on BellSouth's First Data Reconciliation Filing
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1	8	12/05/00	AT&T's Comments on BellSouth's Second Data Reconciliation Filing
1	9	12/18/00	BST's Reconciliation Matrix and Underlying Hot Cut Performance Data for AT&T, Allegiance Telecom, and Mpower
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1	13	05/07/01	PSC's Order on Motions for Reconsideration and Clarification
1	14	05/07/01	BST's Monthly State Summary Report Along with Georgia SQM Data Report for March 2001
2	15	05/14/01	BST's Revised November 2000 "Speed of Answer in Ordering Center" Ordering Report
2	16	05/16/01	BST's Revised Trunk Group Performance-Aggregate Report and Billing-Usage Data Delivery Accuracy Report
2	17	05/30/01	BST's Revised Monthly State Summary Report for March 2001 and Overview of Revisions
2	18	05/30/01	BST's Monthly State Summary Report and Georgia SQM Data Report for April 2001

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2	19	06/27/01	BST's Motion To Modify Service Quality Measurements
2	20	07/03/01	BST's Monthly State Summary Report and Georgia's SQM Data Report for May 2001
2	21	07/10/01	BST's Revised Monthly State Summary Report for May 2001
2	22	07/16/01	AT&T's Response to BST's Motion To Modify SQMs and To Maintain Funds in Escrow
2	23	07/31/01	BST's Notice of Filing Corrective Action Plans
2	24	07/31/01	BST's Monthly State Summary Report and Georgia's SQM Data Report for June 2001
2	25	08/01/01	BST's Response to Covad's Operational and Performance Issues
3	26	08/01/01	XO f/k/a NEXTLINK's Opposition to BST's Motion To Maintain Funds in Escrow and Notice of Deposit in Escrow
3	27	08/16/01	AT&T's Motion To Modify Proposed Procedural and Scheduling Order
3	28	08/17/01	DIECA d/b/a Covad's Letter Notifying Commission of Support for AT&T's Motion To Modify Procedural and Scheduling Order
3	29	08/24/01	PSC's Procedural and Scheduling Order
3	30	08/31/01	BST's Monthly State Summary Report and Georgia's SQM Data Report for July 2001
4	31	09/10/01	BST's Proposed Revisions to Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms
5	32	09/10/01	Birch's Initial Comments
5	33	09/10/01	CLEC Coalition's Comments
5	34	09/10/01	Time Warner and e*spire's Joint Comments
5	35	09/12/01	BST's Revisions to Monthly State Summary Report for June 2001
5	36	09/24/01	BST's Response to Proposed Revisions to Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms and Corrected Version of BST's Proposed Revisions Attachment F
5	37	09/24/01	Birch Telecom's Reply Comments to BST's Proposed Revisions to Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms
5	38	09/24/01	US LEC's Reply Comments to BST's Proposed Revisions to Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms
5	39	09/24/01	CLEC Coalition's Reply Comments to BST's Proposed Revisions to Service Quality Measurements, Benchmarks and Analogues, and Enforcement Mechanisms

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